

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE:	:	CHAPTER 7
	:	
DIVYANG GOSWAMI,	:	CASE NO. 20-66432-PWB
	:	
Debtor.	:	
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	:	
S. GREGORY HAYS, Chapter 7 Trustee	:	
for the Estate of Divyang Goswami,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	Adv. Pro. No. 22-05077-PWB
	:	
NEENA D. GOSWAMI,	:	
	:	
Defendant.	:	
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**JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANT TO  
ANSWER COMPLAINT**

COME NOW S. Gregory Hays, as Chapter 7 Trustee for the bankruptcy estate of Divyang Goswami and plaintiff in this adversary proceeding (“**Plaintiff**” or “**Trustee**”); and Neena D. Goswami, a defendant in this adversary proceeding (“**Mrs. Goswami**”), by and through their respective undersigned counsel, and hereby move this Court (the “**Motion**”) for an Order extending the time period within which Mrs. Goswami may answer Trustee’s *Complaint* [Doc. No. 1] (the “**Complaint**”) through and including September 1, 2022. In support of the Motion, Trustee and Mrs. Goswami respectfully show the Court as follows:

1. On May 16, 2022, Plaintiff initiated this adversary proceeding by filing a Complaint [Doc. No. 1].

2. On June 1, 2022, the Court issued an *Alias Summons* [Doc. No. 3] (the “**Summons**”) on Mrs. Goswami.

3. On June 27, 2022, Trustee and Mrs. Goswami filed an *Acknowledgement of Service and Stipulation Extending Time* [Doc. No. 8], through which, among other things, Mrs. Goswami acknowledged service of the Summons and Complaint, and Trustee and Mrs. Goswami agreed that the deadline for Mrs. Goswami to answer the Complaint would be extended through and including August 1, 2022.

4. Plaintiff and Mrs. Goswami (collectively, the “**Parties**”), through their respective counsel, are engaged in discussions regarding a negotiated resolution of Plaintiff’s claims against Mrs. Goswami. To conserve resources while these discussions continue, the Parties agree that the deadline by which Mrs. Goswami may file an answer should be extended through and including September 1, 2022.

5. Accordingly, the Parties request that the Court enter an order extending the Deadline by which Mrs. Goswami may file an answer through and including September 1, 2022.

6. A consent order granting this Motion has been submitted contemporaneously herewith.

WHEREFORE, the Parties pray that this Motion be read and considered, that the Motion be granted and the time within which Mrs. Goswami may file an answer to the Complaint be extended through and including September 1, 2022, and for such other relief as the Court deems appropriate.

[SIGNATURES ON FOLLOWING PAGE]

Respectfully submitted, this 28th day of July, 2022.

ARNALL GOLDEN GREGORY LLP  
*Attorneys for Trustee*

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**CERTIFICATE OF SERVICE**

This is to certify that I, Michael J. Bargar, have this day served a true and correct copy of the foregoing *Joint Motion for Extension of Time for Defendant to Answer Complaint* by electronic mail on all of those persons or entities set forth below at the email addresses stated:

James C. Joedecke, Jr.  
Dana P. Lohrberg  
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This 28th day of July, 2022.

/s/ Michael J. Bargar  
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